



March 26, 2004

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: In the Matter of Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92

Dear Ms. Dortch:

On March 25, 2004, S. Michael Jensen, CEO of Great Plains Communications, Inc., and I met with Commissioner Jonathan Adelstein and his legal advisor wireline issues, Scott Bergman; Jennifer Rosenworcel, competition and universal service legal advisor to Commissioner Copps; Matt Brill, senior legal advisor to FCC Commissioner Abernathy; and Daniel Gonzalez, senior legal advisor to Commissioner Martin, to present Great Plains Communications' ("Great Plains") positions on issues in the above proceeding.

We presented Great Plains' latest views on the status of intercarrier compensation reform and the direction that the FCC should take in this proceeding. Specifically, we noted that rational intercarrier compensation reform for the entire industry, and in particular high-cost areas, must reflect these principles:

- A reasonable allocation of cost recovery from multiple sources, including compensation from interconnecting carriers that utilize a company's network.
- Eliminating intercarrier compensation is fundamentally arbitrary and will lead to incorrect market signals and unintended results, including elimination of incentives to invest in telecommunications infrastructure.
- Intercarrier compensation should evolve to cost-based, uniform compensation for all traffic – interstate and intrastate, access, reciprocal compensation and Voice over Internet Protocol -- but "protocol manipulation" by carriers cannot define the difference between telecommunications services and information services.

We also explained that although Great Plains has resigned from the Intercarrier Compensation Forum, the company continues to work with other companies in the industry on these issues.

Consistent with Commission rules, one electronic copy of this letter is being submitted for the record of the above-referenced docket.

Sincerely,

Michael Urdahl
Vice President-Government Affairs